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February 14, 1995

Reply To
Attn Of: HW-124

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Program Management

Jerry Lyle, Director
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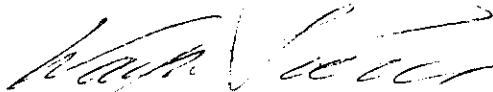
Re: Comments on Track 2 Summary Report for Operable Unit 7-01.

Dear sirs:

We have reviewed the preliminary scoping Track 2 report for the soil vault rows 1 through 13 at the Radioactive Waste Management Complex (RWMC), Subsurface Disposal Area (SDA). The vaults which began operations in 1977, contain mostly irradiated metal. In general, we support the approach taken in the risk assessment to use inventory data from RWMIS. However, the scenarios presented in Table 2a assume institutional controls remain in place which is not in keeping with the National Contingency Plan. Although the release mechanism may be circuitous, it is inappropriate to assume that the air, soil ingestion, and soil leaching to groundwater (industrial) pathways are incomplete based on current industrial practices at INEL. An evaluation would have to be made on whether the area is depositional or erosional and whether burrowing animals could expose or otherwise transport wastes to the surface for volatilization and/or suspension.

Our specific comments are attached. I am available to discuss our comments at your convenience, however, I do not think that more work is needed on the Track 2 to address these concerns. Instead, the additional pathways can be covered during the Pits and Trenches RI/FS or other suitable comprehensive RI/FS. Please contact me at (206) 553-7261 if you have any questions or comments regarding these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Wayne Pierre", written over a horizontal line.

Wayne Pierre, Chief
Federal Facility Section I

Enclosure:

cc: Mary Jane Nearman
Lisa Green

ATTACHMENT

Comments for RWMC (OU 7-01) T2

[illegible]